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VIA ECF

Honorable Ronnie Abrams
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Khoury v. FXCM Inc. et al.*, No. 17-cv-00916-RA
Zhao v. FXCM Inc. et al., No. 17-cv-00955-RA
Blinn v. FXCM Inc. et al., No. 17-cv-01028-RA
683 Capital Partners LP v. Global Brokerage, Inc., f/k/a FXCM, Inc., No. 17-cv-02506-UA

Your Honor:

We are counsel for Plaintiff Tony Khoury and Lead Plaintiff movant 683 Capital Partners, LP and Shipco Transport, Inc. in the above related putative securities class actions. We write to request an adjournment of the initial pretrial conferences scheduled in the following cases until such time as the Court has appointed lead plaintiffs and lead counsel pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4, *et seq.*, lead plaintiffs have filed a consolidated amended complaint and the Court has ruled on defendants’ anticipated motions to dismiss.

- *Khoury v. FXCM Inc. et al.*, No. 17-cv-00916-RA—April 21, 2017 at 2:30 p.m.; and
- *Blinn v. FXCM Inc. et al.*, No. 17-cv-01028-RA—April 21, 2017 at 3:15 p.m.

No initial pretrial conferences are scheduled in *Zhao v. FXCM Inc. et al.*, No. 17-cv-00955-RA and *683 Capital Partners LP v. Global Brokerage, Inc., f/k/a FXCM, Inc.*, No. 17-cv-02506-UA.

Defendants join this request. Plaintiff David Blinn in the *Blinn* Action also joins this request. No party has previously requested an adjournment of these initial pretrial conferences.

The PSLRA provides that: (i) not later than 20 days after the date on which a putative securities fraud class action complaint is filed, the plaintiff shall publish a notice advising members of the purported plaintiff class, (ii) not later than 60 days after the date on which such notice is published

any member of the purported class may move the court to serve as lead plaintiff, and (iii) not later than 90 days after the date on which such notice is published the court shall appoint the “most adequate plaintiff” as lead plaintiff for the class. *See* 15 U.S.C. § 78u-4(a)(3)(A)-(B). The PSLRA also provides that all discovery shall be stayed unless and until the Court denies Defendants’ motion to dismiss the operative complaint, or otherwise modifies the discovery stay. *See* 15 U.S.C. § 78u-4(b)(3)(B).

On February 7, 2017, the PSLRA early notice was timely issued and advised class members of the April 10, 2017 lead plaintiff motion deadline. On April 10, 2017 eight competing consolidation and lead plaintiff motions were filed. Following the Court’s appointment of lead plaintiffs, the parties anticipate that the lead plaintiffs will file a consolidated amended complaint. In light of the procedural posture of this action and to preserve the Court’s resources, the parties seek an adjournment of the initial pretrial conferences in the *Khoury* and *Blinn* actions until such time as the Court has appointed lead plaintiffs and lead counsel, lead plaintiffs have filed a consolidated amended complaint and the Court has ruled on defendants’ anticipated motions to dismiss.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Phillip Kim
Phillip Kim, Esq.

cc: All counsel of record by ECF